FILED

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF ILLINOIS

OCT 2 2 2014

FOR THE SOUTH	EKN DISTRICT OF ILLINOIS	CLERK, U.S. DISTRICT COURT	
UNITED STATES OF AMERICA,)	SOUTHERN DISTRICT OF ILLINOIS EAST ST. LOUIS OFFICE	
Plaintiff,)		
vs.) CASE NUMBER	4-30178-MJR	
REGINALD B. GREEN,)		
SHANE C. ROY, and) 18 U.S.C. § 37	1	
SHAWNTA L. THOMAS)		
)		
Defendants.)		

INDICTMENT

THE GRAND JURY CHARGES:

Count One

CONSPIRACY TO UTTER COUNTERFEIT OBLIGATIONS OR SECURITIES

Between on or about May 16, 2013, through May 19, 2013, in Madison County, within the Southern District of Illinois, and elsewhere,

REGINALD B. GREEN, SHANE C. ROY, and SHAWNTA L. THOMAS,

defendants herein, did combine, conspire, confederate, agree and have a tacit understanding with each other to knowingly possess, pass, or utter falsely made, forged and counterfeited obligations of the United States, that is, Federal Reserve Notes, with the intent to defraud, in violation of Title 18, United States Code, Section 472.

Overt Acts

In furtherance of the conspiracy and in order to accomplish the goals thereof, the defendants, REGINALD B. GREEN, SHANE C. ROY, and SHAWNTA L. THOMAS committed and caused to be committed overt acts, including, but not limited to, at least one of the following:

- On May 16, 2013, defendants REGINALD B. GREEN and SHANE C. ROY, together, used six counterfeit United States \$20 bills to make a purchase at the Flying J Truck Plaza gas station in Pontoon Beach, Illinois, which they then knew to be falsely made, forged and counterfeited.
- 2. On May 19, 2013, defendants REGINALD B. GREEN, SHANE C. ROY and SHAWNTA L. THOMAS, together, used two counterfeit United States \$10 bills and two counterfeit United States \$20 bills to make a purchase at the Hit-N-Run convenience store in Bethalto, Illinois, which they then knew to be falsely made, forged and counterfeited.
- 3. On May 19, 2013, defendants REGINALD B. GREEN, SHANE C. ROY and SHAWNTA L. THOMAS, together, used one counterfeit United States \$10 bill and two counterfeit United States \$20 bills to make a purchase at the Taco Bell fast-food restaurant in Bethalto, Illinois, which they then knew to be falsely made, forged and counterfeited.
- 4. On May 19, 2013, defendants REGINALD B. GREEN, SHANE C. ROY and SHAWNTA L. THOMAS, together, used five counterfeit United States \$20 bills to

make a purchase at the Wal-Mart store in Granite City, Illinois, which they then knew to be falsely made, forged and counterfeited.

- 5. On May 19, 2013, defendant SHAWNTA L. THOMAS, knowingly possessed six counterfeit \$50 bills, three counterfeit \$20 bills and two counterfeit \$10 bills.
- On May 19, 2013, defendants REGINALD B. GREEN and SHANE C. ROY, knowingly possessed five counterfeit \$10 bills.

All in violation of Title 18, United States Code, Section 371.

STEPHEN R. WIGGINTON United States Attorney

Southern District of Illinois

JOHN C. CONSTANCE

Assistant United States Attorney

RANLEY R. KILLIAN

Assistant United States Attorney

Bond Recommendation: \$25,000 unsecured